

Office of the Secretary  
Federal Communications Commission  
Attention: Disability Rights Office, Room 3-B431  
445 12th Street, SW  
Washington, DC 20554

Received & Inspected  
DEC 30 2011  
FCC Mail Room

**Re: Petition for Exemption from Closed Captioning Requirements  
CG Docket No. 06-181, CGB-CC-\_\_\_\_\_**

## **Introduction**

Describe the background of the church:

Message For Today (MFT) is a religious service, reaching individuals through mailings, local and regional media outlets, and the Internet.

MFT is a non-profit religious organization that filed Articles of Incorporation with the State of Iowa on October 27, 2011. (see attachment)

MFT serves individuals by uplifting Christ in people's lives, sharing the Good News of the bible, strengthening families, strengthening marriages, assisting people in living healthier lifestyles and ultimately helping people prepare for the soon return of Jesus Christ.

Describe the program generally:

Message For Today is the title of a 30 minute taped program produced weekly containing sermons by Pastor Dale Morrison. The weekly program contains lessons from the bible, which serves many needs of the individuals watching the program. Viewers will be uplifted and blessed each week as they view the program.

Describe the program specifically:

Message For Today is a 30-minute program that will be aired weekly. MFT is in its infancy and has yet to air the first program, however our first contract has been signed to broadcast on KPXR starting on January 1, 2012 from 8:00 – 8:30 a.m. on Sunday mornings. The frequency, channel, and time for additional stations are yet to be secured. We are in negotiations with KYOU for a year contract, but will need to secure additional funding prior to signing a contract. Volunteers from the Seventh-Day Adventist Church produce the MFT 30-minute programs. The program is designed to reach all demographics of our population.

Providing captioning for this program would result in significant difficulty or expense. Thus, for the reasons set forth below, Message For Today hereby requests an "economically burdensome" exemption from the closed captioning rules for the weekly "Message For Today" program, pursuant to § 79.1(f) of the Commission's rules.

## **Nature and Cost of Closed Captions**

Provide details on the cost of closed captions:

Cost for closed captioning is \$235 per broadcast. (see attachment) This equates to \$12,220/yr/station. The intentions of MFT are to broadcast on as many stations as we can raise funds for. The added expense of captioning will be an economic burden. We also contacted the stations we are in negotiations with and they are not able to assist in the

cost of captioning. (see attachment) As a non-profit organization, Message For Today relies on the generous donations of local church members to secure the cost of airtime; the additional financial burden of captioning would result in our inability to fund the broad casts.

The Board of Directors for Message For Today discussed other options to captioning such as scrolling the text of the sermon. The board decided that this was not a feasible option as we currently struggle to find volunteers to tape, edit, and produce the 30-minute sermons. The board could not find a person that could commit the amount of time required to type each week's sermon and edit the text into the final tape.

#### **Impact on the Operation of the Program Provider**

Describe the impact that these costs would have on the program:

The impact that captioning would create on the operations of Message For Today would be significant.

The total cost to produce the weekly "Message For Today" broadcast is minimal due to the volunteer work of church members. Hard costs of securing the video equipment, software, and laptop are one-time costs of \$5,000 with a useable life of 5 years. Hard costs then projected over 5 years with an estimated 3 stations per year and 52 broadcasts per station are only adding \$6.41 per 30-minute program. The cost of airtime for each station varies depending on day/time/market. Quotes range from \$155 - \$250 for a 30-minute program. The cost of captioning increases each 30-minute program by \$235, an increase of 93% to 150%. Currently with volunteers, our costs run approximately 3% to cover hardware and 97% to cover costs of airtime.

The additional expense of captioning will definitely have an impact on our organization to continue in this ministry. We operate completely on donations and we currently do not have enough operating capital to purchase the airtime we have planned. Our fund-raising efforts are focused on raising funds to sign one or two more contracts with local stations. If required to fund captioning, then our efforts to take this message to our communities will not be possible.

#### **Financial Resources of the Program Provider**

Explain the financial position of the church:

Message For Today is a non-profit organization, which is endorsed by the Seventh-Day Adventist Church. MFT has a Board of Directors with officers that manage and secure donations for operational costs. Members of the board donate all time, office equipment, and related costs. Financial donations come from church members. (see attached financial statement) Our primary costs are securing airtime for broadcasting the weekly program. Please note that our ministry is very small with a financial balance, as of 12-19-2011, of \$14,225.13. Our current funding will not cover costs for airtime; any increase in production costs such as captioning would simply not be possible and would force Message For Today to cease operations.

We have asked the stations to assist us in the captioning costs and they are unable to assist us, they have referred us to companies that charge for this service.

### **Type of Operations of the Program Provider**

Describe the operations of the church:

Message For Today is a non-profit religious organization created to share the good news of Jesus Christ with the people around us. There are many activities we will use to accomplish our mission. Direct mail bible studies, Internet bible studies, radio broadcasting, TV Broadcasting, local seminars on health, finance, depression, marriage, and healthful cooking will all be utilized.


### **Conclusion**

As shown by this Petition and its attachments, the Commission should grant a waiver of the closed captioning requirements in this case, because requiring closed captioning would be economically burdensome. The costs of captioning would be excessively high and would have a significant impact on Petitioner's operations, undermining its ability to provide the program. The Petitioner's type of operations and financial resources are different in kind and magnitude from a mainstream-programming provider. Because of the significant difficulty and expense of providing closed captions, a waiver under § 79.1(f) is warranted. If more information is needed, please contact me at the address provided below.

Respectfully submitted,

Message For Today

By:



Dale Morrison, Director

PO Box 10253

319-329-7780

Dated: 12-20-2011

STATE OF IOWA  
LINN COUNTY

)  
) ss.:

AFFIDAVIT OF DALE MORRISON

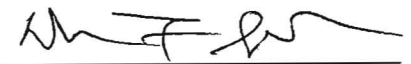
I, DALE MORRISON, being first duly sworn, depose and state:

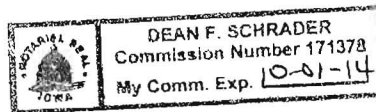
1. I am the DIRECTOR at MESSAGE FOR TODAY, in CEDAR RAPIDS, IOWA. I am over the age of 21.
2. I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of MESSAGE FOR TODAY, and, upon information and belief, believe the statements regarding our organization and MESSAGE FOR TODAY to be true and accurate.

FURTHER AFFIANT SAYETH NOT.

  
DALE MORRISON

SUBSCRIBED TO AND SWORN  
before me this 20<sup>th</sup> day of December, 2011.

  
Notary Public



# IOWA

No: W00762340  
Date: 10/27/2011

## SECRETARY OF STATE

504RDN-425191  
MESSAGE FOR TODAY

### ACKNOWLEDGEMENT OF DOCUMENT FILED

The Secretary of State acknowledges receipt of the following document:

Articles of Incorporation

The document was filed on Oct 27 2011 9:09AM, to be effective as of Oct 27 2011 9:09AM.

The amount of \$20.00 was received in full payment of the filing fee.



  
MATT SCHULTZ, SECRETARY OF STATE



Printed on  
Recycled Paper

**From:** Constance Carlson [mailto:[ccarlson@vicaps.com](mailto:ccarlson@vicaps.com)]  
**Sent:** Wednesday, December 14, 2011 12:12 PM  
**To:** [dale@morrisonapp.com](mailto:dale@morrisonapp.com)  
**Subject:** Closed Captioning Your 30-minute Show

Hi Dale,

Good speaking with you! Video Caption Corporation would be pleased to assist you with the closed captioning of your 30-minute weekly show. As I understand it, you would supply the video to us on DVD. Our deliverable to you would be a Closed Caption Master (Basic Roll-up Style Captions) authored to DVD.

Pricing: \$235 per show (discounted)

Price includes transcription, captioning (Basic Roll-up Style Captions), DVD authoring, and disc stock. Our standard turnaround is 3 business days. Faster turnarounds, including same day, are available at additional charge. As a regular client, we will waive rush fees on your occasional need for 2-day turnaround services and significantly discount faster turnarounds and other services. Shipping and handling of your DVDs are additional.

Dale, we would truly be honored to support "Message for Today" with its needs for captioning! I know you'd be 100% delighted with our services, including the quality of our work. Your captioning will be completely accurate and the captions will be perfectly timed to your shows.

Please call me if you have questions – I will follow up with you early next week.

Best regards,

Constance

**Constance Carlson**  
**Vice President, Sales & Marketing**

**From:** Elrod, Mike [mailto:[melrod@kyoutv.com](mailto:melrod@kyoutv.com)]  
**Sent:** Thursday, December 15, 2011 9:00 AM  
**To:** Dale Morrison  
**Subject:** RE: Closed Captioning

Hello Mr. Morrison,

In response to your request for assistance in closed captioning your weekly program, KYOU will not be in a position to offer assistance.

Thanks

Michael Elrod  
General Manager  
KYOU FOX - 15  
820 W Second St  
Ottumwa, IA 52501  
Phone: [641-684-5415](tel:641-684-5415)  
FAX: [641-682-5173](tel:641-682-5173)

## MESSAGE FOR TODAY

Financial Report - November/December 2011				
Date	Transaction	Payment	Deposit	Balance
11/8/11	D&R Pest Control		500.00	500.00
11/8/11	Thompson Home Improvement		500.00	1,000.00
11/27/11	Dale Morrison - laptop	1,000.00		0.00
11/28/11	Iowa City SDA		15,000.00	15,000.00
11/30/11	Dividend		0.13	15,000.13
12/12/11	S.R.B.C.-KPXR - 5 airings	775.00		14,225.13